UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 22-CV-11553

NATALIE ANDERSON,

Plaintiff,

v.

MARRIOTT INTERNATIONAL, INC., RESIDENCE INN NASHUA (formerly known as RESIDENCE INN BY MARRIOTT located in NASHUA and is also the DBA of NASHUA TS LODGING, LLC); TRUE NORTH HOTEL GROUP AND JENNIFER BROOKS,

ALLOWED David H. Hennessy U.S.M.J.
Aug 31, 2023

Defendants.

PARTIES' JOINT MOTION FOR FINAL EXTENSION OF THE DEADLINE IN THE COURT'S SETTLEMENT ORDER OF DISMISSAL

The Parties jointly move this Honorable Court to issue an order extending the deadline for the Court's settlement order of dismissal with prejudice, until September 15, 2023. In support of this Motion, the Parties state the following:

1. On May 23, 2023, the Court entered an order, pursuant to settlement reached in mediation, stating:

"The Court having been advised by Counsel that this action has settled, IT IS ORDERED that this action is hereby dismissed without costs and without prejudice to the right of any party upon good cause shown within thirty (30) days to reopen the action if settlement is not consummated."

2. On June 16, 2023, the parties filed a stipulation of extension as follows:

"The parties hereby stipulate and agree to an extension up to and including to July 31, 2023, of the deadline that was provided in the court's settlement order of dismissal dated May 23, 2023."

- 3. On July 28, 2023, the Court entered an order granting the Parties' Joint Motion for Extension of Time to August 30, 2023 for the Court's settlement order of dismissal without prejudice.
- 4. The Parties hereby move the Court to allow a final extension up to and including September 15, 2023, for the court's settlement order of dismissal, so that the parties may finalize the settlement and subsequently file a stipulation of dismissal with prejudice.

Plaintiff, The Defendants, MARRIOTT INTERNATIONAL, INC., NASHUA TS LODGING LLC; TRUE NORTH HOTEL GROUP: INC., and /s/ Natalie Anderson JENNIFER BROOKS, Natalie Anderson By Their Attorneys, 679 Washington Street, Suite #8-206 Attleboro, Massachusetts 02703 MORRISON MAHONEY LLP Liberty 6@msn.com /s/ Amy B. Yarbro Amy B. Yarbro, BBO # 686665 ayarbro@morrisonmahoney.com 250 Summer Street Boston, MA 02210 (617) 439-7500

CERTIFICATE OF SERVICE

I, Amy B. Yarbro, attorney for the defendants, hereby certify that I have this day served the foregoing to all parties of record in this action by e-mail to:

Natalie Anderson 679 Washington Street, Suite #8-206 Attleboro, Massachusetts 02703 Liberty 6@msn.com

Dated: August 31, 2023 Attorney: /s/ Amy B. Yarbro
Amy B. Yarbro